

Michael S. Danko (SBN 111359)  
Kristine K. Meredith (SBN 158243)  
**DANKO MEREDITH**  
333 Twin Dolphin Drive, Suite 145  
Redwood Shores, California 94065  
Telephone: (650) 453-3600  
Facsimile: (650) 394-8672  
mdanko@dankolaw.com  
kmeredith@dankolaw.com

Eric Gibbs (SBN 178658)  
Dylan Hughes (SBN 209113)  
**GIBBS LAW GROUP LLP**  
505 14th Street, Suite 1110  
Oakland, California 94612  
Telephone: (510) 350-9700  
Facsimile: (510) 350-9701  
ehg@classlawgroup.com  
dsh@classlawgroup.com

Dario de Ghetaldi (SBN 126782)  
Amanda L. Riddle (SBN 215221)  
**COREY, LUZAICH**  
**DE GHETALDI & RIDDLE LLP**  
700 El Camino Real  
P.O Box 669  
Millbrae, California 94030  
Telephone: (650) 871-5666  
Facsimile: (650) 871-4144  
deg@coreylaw.com  
alr@coreylaw.com

*Attorneys for Movants Julie Poincenot,  
Patrick Doolittle, Megan Van Mater Davidson  
and Paul Lore*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

**In re:**

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)

**PG&E CORPORATION  
&  
PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

Affects:

☐ PG&E Corporation  
☐ Pacific Gas & Electric Company  
☒ Both Debtors

**DECLARATION OF BRADFORD  
BOWEN RE DOCUMENTS TO BE  
FILED UNDER SEAL PURSUANT TO  
COURT INSTRUCTIONS IN SUPPORT  
OF MOTION TO STAY PROCEEDINGS  
RE DISPUTED CLAIMS UNDER FIRE  
VICTIM TRUST AGREEMENT**

\* All papers shall be filed in the Lead  
Case, No. 19-30088 (DM)

**Date: July 30, 2024**

**Time: 10:00 a.m.**

**Location: Telephone/Videoconference**

**<https://www.canb.uscourts.gov/calendars>**

In re PG&E Corporation & Pacific Gas and Electric Company, Chapter 11 Case No. 19-30088 (DM)  
DECLARATION OF BRADFORD BOWEN RE DOCUMENTS TO BE FILED UNDER SEAL PURSUANT TO  
COURT INSTRUCTIONS IN SUPPORT OF MOTION TO STAY PROCEEDINGS RE DISPUTED CLAIMS  
UNDER THE FIRE VICTIM TRUST AGREEMENT & REVIEW OF FVT INTERPRETATION OF PLAN  
LANGUAGE

1  
2 I, Bradford Bowen, hereby declare as follows:

3 1. I am an attorney at law duly licensed to practice before all courts in the State of  
4 California and the Northern District of California and am an attorney with Danko Meredith, a  
5 part of the Northern California Fire Lawyers, counsel of record for the movants Julie Poincenot,  
6 Patrick Doolittle, Megan Van Mater Davidson, and Paul Lore (collectively, the Movants or  
7 Claimants).

8 2. I am a custodian of the records and files of the Movants as they pertain to the  
9 claims of each of the Movants. I have personally worked on the records and files related to this  
10 matter.

11 3. All of the records, documents, and emails described herein below were made and  
12 are maintained by our office in the ordinary course of its business and are currently under my  
13 custody, or were received by our office from the Fire Victim Trust, or from the docket in this  
14 matter, or in support of the claims.

15 4. All such records, documents, and emails described below are kept by our office in  
16 the course of its regularly conducted business activities, and were made at or near the time by, or  
17 from information transmitted by, an employee or agent with knowledge of the act, event,  
18 condition or opinion and a duty to make such records, documents, and emails, or were received  
19 from the Fire Victim Trust, or from the docket in this matter.

20 5. To the extent that I have personal knowledge of the facts set forth herein, I will  
21 set forth said personal knowledge. To the extent that I do not have personal knowledge, then I  
22 have gained such knowledge in the course and scope of my employment at Danko Meredith, by  
23 reviewing the records, documents, and emails in this matter, and by reviewing the docket in this  
24 matter.

25 6. If called upon to testify in this action as to the matters set forth in this declaration,  
26 I could and would competently testify thereto.

27 7. In addition to the documents listed below that are being filed under seal, there are  
28 approximately 3,000 pages of medical and financial records that were submitted to the FVT, and

1 available to the Neutral in her evaluation of the case. I am not able to state which, if any, were  
2 examined by the Neutral, The Trustee, or her consultant. Due to the volume, sensitive nature of  
3 these documents, and the small likelihood that they would help with the pending motion, they are  
4 not being submitted at this time. They are available and compiled should they need to be filed in  
5 the future.

6 8. Pursuant to the Court's express directive during the hearing on Movants' Motion  
7 To Stay Proceedings Re Disputed Claims Under Fire Victim Trust Agreement And Review Of  
8 FVT Interpretation Of Plan Language, Docket No. 14 491 ("Motion") on July 30, 2024, the  
9 Movants submit the following documents under seal:

- 10 a. Determinations and Denials of LHON Claims, a true and correct copy of which is  
11 submitted under seal;  
12 b. Briefs and Research in Support of LHON Claims, a true and correct copy of  
13 which is submitted under seal;  
14 c. Expert Materials in Support of LHON Claims, a true and correct copy of which is  
15 submitted under seal;

16  
17 If called upon to testify in this action as to the matters set forth in this declaration, I could  
18 and would competently testify thereto.

19  
20 I declare under penalty of perjury under the laws of the United States and the State of  
21 California that the foregoing is true and correct.

22 Executed on August 2, 2024 at Redwood City, California.

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25 BRADFORD BOWEN

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# EXHIBITS FILED UNDER SEAL